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BY FAX

Honorable Robert P. Patterson
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2250
New York, New York 10007

Re: Coach Services, Inc. v. Vani U.S.A. Inc.
Civil Action No. 07-Civ-08354 (RPP)
Our Docket No. 7162/77769

Dear Judge Patterson:

Plaintiff, COACH SERVICES, INC. ("Coach"), hereby requests a pre-motion conference to discuss possible sanctions against defendants GUANGZHOU WEINI LEATHER CO. LTD. ("Weini") and GUANGZHOU HUANI CO. LTD. ("Huani"), pursuant to Rule 37(b) F.R.Civ.P.

Your Honor will recall that defendants Weini and Huani did not respond to plaintiff's first request for production of documents and things. Upon Coach's application, your Honor issued an order on April 17, 2008 (Docket No. 16), requiring defendants Weini and Huani to respond to plaintiff's first request for production of documents and things by April 30, 2008. No response has been received.

Accordingly, on May 2, 2008, Coach's undersigned counsel telephoned and wrote to defendants' counsel to determine whether responses and documents were forthcoming. Defendants' counsel, Ms. Hadfield, told me that there would be no further responses. I gave her until May 5, 2008, to produce any further documents. Again, no responses or documents have been received.

MEMO ENDORSED

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DATE FILED: 5/13/08

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It should also be noted that on March 31, 2008, defendants Weini and Huani served their first request for production of documents and things on Coach, to which Coach has responded. Discovery obviously is a two-way street.

Therefore, it is respectfully requested that the Court hold a conference or otherwise issue an order granting sanctions against defendants Weini and Huani, including payment of expenses under Rule 37(b)(2)(C), and for such other and further relief as the Court deems just and proper.

Respectfully,



Norman H. Zivin (NZ-6053)
Attorney for Plaintiff

NHZ/ef

cc: Frances P. Hadfield, Esq. (by fax)

SEE TYPEWRITTEN MEMO
ENDORSEMENT ATTACHED

appellate granted
at conference will be
held on this application
on May 16, 2008, at 1:30 PM
by telephone conference and teleconferencing
and would all attend.
So ordered
Robert P. Patterson
May 13, 2008

**Case: Coach Services v. Vani USA, Inc., et al.
Index No. 07 Civ. 8354 (RPP)**

MEMO ENDORSEMENT READS:

Application granted.

*A conference will be held on this application on May 16, 2008
at 9:30 a.m. Defendants Weini and Huani and counsel are to attend.*

So ordered.

Robert P. Patterson, Jr., U.S.D.J., May 13, 2008